

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC.,
PELVIC REPAIR SYSTEMS
PRODUCTS LIABILITY LITIGATION

MDL NO. 2327

THIS DOCUMENT RELATES TO THE CIVIL ACTION NOS. LISTED ON THE ATTACHED EXHIBITS:

**JOINT MOTION TO DISMISS DEFENDANT
AMERICAN MEDICAL SYSTEMS, INC. WITH PREJUDICE**

Plaintiffs in the cases listed on the attached Exhibits A-C and defendant American Medical Systems, Inc. (“AMS”) advise the Court that they have compromised and settled all claims between them in these actions, including all counterclaims, cross-claims and third party claims. Accordingly, Plaintiffs and AMS jointly move the court to dismiss AMS as a defendant in these actions with prejudice, and terminate AMS from the docket in the actions. Other defendants remain in these actions, and plaintiffs will continue to prosecute these actions against them.

Respectfully:

/s/ Barbara R. Binis

Barbara R. Binis

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Dated: April 17, 2015

EXHIBIT A - ANDRUS WAGSTAFF

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:14-CV-00803	Patricia Holley, Lynn Holley v. Ethicon, Inc., American Medical Systems, Inc., Johnson & Johnson
2:14-CV-17858	Katherine Koehler v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT B - THE LANIER LAW FIRM

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:12-CV-06730	Pansy Lee Henderson, James H. Henderson v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:13-CV-11855	Lynne Maria Finding v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT C - MOTLEY RICE

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:13-CV-07953	Lynda Myers-Placek v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on April 17, 2015, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in these member cases.

/s/Barbara R. Binis